IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

STANLEY BLACK & DECKER, INC. and THE BLACK & DECKER CORPORATION,

Plaintiffs,

Case No.: 1:20-cv-06808

Judge Robert M. Dow, Jr.

v.

Magistrate Judge Susan E. Cox

THE PARTNERSHIPS AND UNINCORPORATED ASSOCIATIONS IDENTIFIED ON SCHEDULE "A",

Defendants.

NOTICE OF MOTION

PLEASE TAKE NOTICE that on Thursday, January 21, 2021, at 9:00 a.m., Plaintiffs, by their counsel, shall appear by remote means, before the Honorable Robert M. Dow, Jr., at the U.S. District Court for the Northern District of Illinois, and present Plaintiffs' Motion for Entry of Default Judgment against the Defendants Identified in the First Amended Schedule A.

DATED: January 13, 2021 Respectfully submitted,

/s/ Keith A. Vogt Keith A. Vogt (Bar No. 6207971) Keith Vogt, Ltd.

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ATTORNEY FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on January 13, 2021, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, I will electronically publish the documents on a website to which the Defendant Domain Names that have been transferred to SBD's control now redirect, and I will send an e-mail to the e-mail addresses identified in Exhibit 2 to the Declaration of Adan Ayala and any e-mail addresses provided for Defendants by third parties that includes a link to said website.

/s/ Keith A. Vogt Keith A. Vogt, Esq.